NASA Standard Operating Procedure

Procedure for Extending an IT System Authorization To Operate

REVISION RECORD

ITEM NO.	REVISION	DESCRIPTION	DATE
1	V2.0	Marion Meissner: Updated to allow for extensions on a case-by-case basis if system owners demonstrate clear progress or a concrete plan for completing C&A	5/8/2006
2	B	Marion Meissner: Changed ITSO to ISSO; removed Jamil Farshchi as approver of an EATO	11/0806
3	C	Steven Adair: Updated to reflect changes in process for requesting and granting of an extension for an ATO; modified form in Appendix A to reflect System AO as final approver; other minor edits.	02/26/2007

Procedure for Extending an IT System Authorization To Operate

Introduction

This document outlines the procedure for requesting and approving an extension of an Authorization To Operate (ATO) for a NASA IT system. This procedure applies to NASA systems that have an existing, unexpired ATO and which have not made any significant changes to the system or its operating environment since the previous certification and accreditation (C&A) was completed and the ATO was granted. It should be noted that systems that have not yet been through the National Institute of Science and Technology (NIST) Special Publication (SP) 800-37 C&A process may have an Authorization To Process (ATP). In these instances, for the purpose of this document, the two terms ATP and ATO may be used interchangeably.

An extension to an ATO may be requested and approved in extraordinary circumstances and for the purpose of allowing extra time to meet stringent C&A requirements, where a concrete plan with milestones exists to meet these requirements. ATO extensions are not intended to increase the length of the standard C&A cycle.

An extension to an ATO may be requested and approved for a single period of up to eleven months. The length of the extension period will be determined on a case by case basis by the system owner, the appropriate Center Information Technology Security Manager (ITSM) and the system's Authorizing Official (AO). No additional extensions will be approved within each C&A cycle.
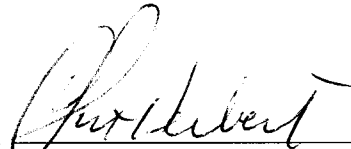
Note: This SOP describes the process for receiving an extended ATO (EATO). This is a NASA-specific term and is not equivalent to an Interim ATO (IATO) as defined in NIST SP 800-37. An IATO may only be granted after a system has completed the certification portion of the C&A process.

Procedure

1. The Information System Security Official (ISSO or equivalent) and the system owner of the IT system complete the form in Appendix A of this SOP and submit it along with any supporting documentation to the system's AO for review.

2. The AO will review the request and any supporting documentation and make a determination as follows:
   a. **Approved** - The system ATO will be extended for requested time (not to exceed eleven months or extend past September 30, 2007). At the end of this time, the system must have completed the regular C&A process, as specified in NASA policy.
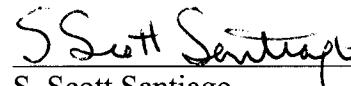
b. **Denied** - The system ATO will expire on its original expiration date. In order to continue operating past this date, the system must have successfully completed the C&A process, as specified in NASA policy.

3. The extension of the system ATO is to be recorded in the Center's security documentation respository (ITSR2D2, ITSC, etc.).

4. A copy of the approved extension request is provided by the ISSO or system owner to the ITSM of the Center where the system is located.

Signatures

_____   _____
Clinton G. Herbert   3/1/2007
Deputy Associate Administrator, OSPP   Date

_____   _____
S. Scott Santiago   3/1/2007
Deputy Chief Information Officer for IT Security   Date

Appendix A

Form to Request and Approve an Extension of a NASA IT system ATO

Extension Request for NASA IT System Authorization To Operate

System (name, plan number per ITS-SOP-0007):	Security Impact Level: ☐ High ☐ Moderate ☐ Low
Organization/Center(s):	Date Current ATO Expires:
Length of Requested Extension: ☐ 3 months ☐ Other:_____	
Reason for Extension:	
Comments/Supporting Documentation (EATO plan w/ milestones, etc):	

There have been no significant changes to the above system or its operating environment since the previous C&A was completed and the ATO was granted.	
System ISSO (name, title, org.):	Contact Information Phone: E-Mail: Fax:
ISSO Signature: Date:	
System Owner (name, title, org.):	Contact Information Phone: E-Mail: Fax:
System Owner Signature: Date:	

☐ Approved ☐ Denied New Date ATO Expires: Reason for Denial:	
System AO (name, title, org.):	Contact Information Phone: E-Mail: Fax:
System AO Signature: Date:	